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9 Attorneys for BRIAN WAYNE WENDT

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 JONATHAN JOSEPH NELSON, et al.,

17 Defendants.  
18  
19

**Case No. CR-17-00533-EMC**

**SUPPLEMENTAL DECLARATION  
OF K. ALEXANDRA McCLURE IN  
SUPPORT OF BRIAN WENDT'S  
SENTENCING MEMORANDUM**

**Court: The Honorable Edward M. Chen  
District Judge**

20 I, K. Alexandra McClure, declare that:

21 1. I have been appointed under the Criminal Justice Act along with John T.  
22 Philipsborn to represent Brian Wendt.

23 2. With the Court's permission (and apologies for the delay), attached hereto  
24 as Exhibit B is a true and correct copy of a letter I received today June 9, 2024 by email,  
25 from a close friend of Brian Wendt for the Court's consideration at sentencing.

26 I declare under penalty of perjury that the foregoing is true and correct, except as  
27 to those matters alleged on information and belief, and as to those matters, I believe this  
28 declaration to be true and accurate.

**SUPP. DECL. OF K. ALEXANDRA MCCLURE IN SUPPORT OF  
BRIAN WENDT'S SENTENCING MEMORANDUM**

Executed this 9th day of June, 2024, at San Francisco, California.

/s/ K. Alexandra McClure  
Declarant and Attorney for Brian Wendt

# EXHIBIT B

June 9, 2024

Dear Judge Edward Chen

I hope this letter finds you well. I wanted to take a moment to share some thoughts about someone who has made a significant impact on my life: Brian.

Brian is not only a great friend but also feels like family to me. His unwavering care and support have been a constant source of comfort and strength. Whether I'm facing challenges or celebrating successes, Brian is always there, offering a listening ear and thoughtful advice.

His kindness and compassion are truly remarkable. He goes out of his way to ensure that those around him feel valued and supported. Brian's caring nature has created a positive ripple effect in my life, and I am immensely grateful for his presence.

In both good times and bad, Brian stands as a pillar of reliability and warmth. His friendship is a treasure, and I feel fortunate to have him by my side.

Beyond his personal qualities, Brian's actions speak volumes. He consistently demonstrates his commitment to those he cares about through countless acts of kindness. Whether it's helping with a difficult task, providing encouragement during tough times, or simply being there to share a laugh, Brian's generosity and empathy shine through. He has an incredible ability to understand and connect with people, making everyone feel seen and heard.

Brian's influence extends beyond our immediate circle. His positive attitude and genuine concern for others have a way of inspiring those around him to be better versions of themselves. He has taught me the value of true friendship and the importance of being there for one another, no matter the circumstances.

One of the many ways Brian and I have strengthened our bond is through our shared passion for karate. Training together has been an incredible experience. It has not only improved our physical abilities but also deepened our mutual respect and understanding. Brian's dedication and discipline in karate are truly impressive. He encourages me to push my limits and always supports me, whether we're sparring or learning new techniques. The time we spend training has brought us closer, fostering a sense of camaraderie and trust that extends beyond the dojo.

Brian feels like family to me because of his unwavering loyalty and the deep emotional connection we share. He has been a constant presence in my life, offering the kind of

unconditional support and understanding that is rare to find. His influence and friendship have become an integral part of my life, making me feel truly blessed to have someone like him.

I am continuously amazed by his resilience and the grace with which he handles life's ups and downs. Brian's strength and optimism are truly inspiring, and they serve as a reminder that with the right support and mindset, anything is possible.

If Brian is in a facility near the Fresno/Tulare area, I intend to visit him regularly. His companionship means so much to me, and I want to be there for him just as he has always been there for me. Ensuring he feels supported and cared for is a priority for me, and I look forward to maintaining our strong bond no matter where life takes us.

Thank you for taking the time to read this letter. I just wanted to express how much Brian means to me and how much I appreciate everything he does. It is not often that we come across people who make such a profound difference in our lives, and I feel incredibly blessed to have Brian as a friend and family member.

Warm regards,

James M Arce